Case 7:18-cv-88892-KMK-AEK B884ment 119 Filed 10/13/22 Page 1 of 1



Nixon Peabody LLP 677 Broadway, 10th Floor Albany, NY 12207-2996 Christopher J. Stevens

Attorneys at Law nixonpeabody.com @NixonPeabody.LP

T / 518.427.2737 F / 833.755.3041 cstevens@nixonpeabody.com

October 13, 2022

BY ECF FILING

Hon. Kenneth Karas United States District Judge Southern District of New York 300 Quarropas Street White Plains, New York 10601-4150

Re:

U.S. and State of New York ex rel. Munford v. Maranatha Human Svcs., et al.

18 CV 08892 (KMK) (AEK)

Dear Judge Karas:

We write, jointly with Relator's counsel, respectfully to request an adjournment of the pre-motion conference currently scheduled for October 20, 2022, pertaining to Relator's motion for leave to amend her complaint. The parties jointly request an adjournment of the pre-motion conference until after the close of fact discovery, which is currently scheduled to be completed by November 14, 2022.

The parties do not anticipate that discovery will be impacted by a decision on Relator's motion. Therefore, given the amount of time the parties will need to dedicate to discovery in this matter between now and November 14, 2022, with nearly a dozen depositions to take and defend between now and then, we respectfully request that the pre-motion conference on October 20th be adjourned to after November 14th.

Thank you for your consideration of this request.

Granted. The conference is adjourned to

11/ 10/22, at 100

10/10/00

CA 10

Respectfully submitted,

Christopher J. Stevens

Counsel for Defendant Maranatha

Heidi A. Wendel

Heidi A. Wendel

Counsel for Relator Stephanie Munford